

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ROBERT F. KENNEDY, JR.,  
AMERICAN VALUES 2024, and  
JESSICA REED KRAUS,  
*Plaintiffs,*

-v.-

META PLATFORMS, INC., FACEBOOK  
OPERATIONS, LLC, INSTAGRAM, LLC,  
MARK ZUCKERBERG, and JOHN DOES 1-  
10,  
*Defendants.*

Case No. 3:24-cv-02869

**[PROPOSED] ORDER ON  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**[PROPOSED] ORDER**

For good cause shown, and upon consideration of all the evidence submitted and the parties' briefs, Defendants are HEREBY ORDERED:

(i) to desist from any further censorship of the documentary film *Who is Bobby Kennedy*;  
(ii) to desist from any further threats to take punitive action against users who try to watch, share or post links to that film or otherwise express support or advocacy for Mr. Kennedy's candidacy;

(iii) to desist from any further misrepresentations of that film; (iv) to desist from any further censorship (including "shadow-banning" and all forms of reducing reach) of support, advocacy, encouragement to vote, or urging to vote for Mr. Kennedy; (v) to immediately implement changes to Meta, Facebook, and Instagram content-moderation algorithms to stop all flagging, marking, censoring, and filtering of any kind based on the fact that content contains, refers or relates to Mr. Kennedy;

(vi) to lift any suspensions, restrictions or other measures taken against users for expressing support or advocacy for Mr. Kennedy;

(vii) to send all users a message saying expressly that content will not be censored or deemed in violation of community standards merely because it expresses support for or advocates on behalf of Mr. Kennedy; and (viii) to desist from any further collusion with federal officials to censor speech by or supportive of Mr. Kennedy.

July \_\_, 2024

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United States District Judge